REMARKS/ARGUMENTS

Reconsideration of the application is requested.

Claims 1-11 are now in the application. Claims 8-10 have been withdrawn. Claim 11 has been added.

In item 3 on page 2 of the above-identified Office action, claims 3-5 have been rejected as being indefinite under 35 U.S.C. § 112, second paragraph.

More specifically, the Examiner has stated that he finds no explanation of the build-up of black in the specification or drawings. The Examiner's attention is directed to page 7, lines 7-22 of the specification.

It is accordingly believed that the claims meet the requirements of 35 U.S.C. § 112, second paragraph. Should the Examiner find any further objectionable items, counsel would appreciate a telephone call during which the matter may be resolved.

In item 2 on pages 3-4 of the above-mentioned Office action, claim 1 has been rejected as being anticipated by Decker et al. (US 6,281,984 B1) under 35 U.S.C. § 102(e).

In item 4 on pages 4-5 of the above-mentioned Office action,

claim 6 has been rejected as being unpatentable over Decker et

al. in view of Chan (US 5,107,332) under 35 U.S.C. § 103(a).

As will be explained below, it is believed that the claims

were patentable over the cited art in their original form and

the claims have, therefore, not been amended to overcome the

references.

Before discussing the prior art in detail, it is believed that

a brief review of the invention as claimed, would be helpful.

Claim 1 calls for, inter alia:

> by using inverse gamut mapping, transforming color values
> from the first image data set into color values of a
> device-independent color space and, by using gamut
> mapping, transforming these device-independent color
> values into the second image data set of an output
> device.

First, Applicants would like to explain what "gamut mapping"

actually is. Gamut mapping is a transformation that is

globally unique throughout the color spaces preserving the

gamut. Please see page 4, line 24 to page 5, line 9 of the

specification for details.

Decker et al. disclose a method and a program for converting a first four-dimensional device-dependent data set (CMYK) into a second equivalent four-dimensional device-dependent data set (C'M'Y'K'). In contrast to the Examiner's belief, however, in Decker et al. transformations between device-dependent data spaces and device-independent data spaces (e.g. Lab) are not performed using global gamut mapping or inverse gamut mapping as recited in claim 1 of the instant application. In fact, the Examiner did not give any concrete citation in item 2 of his section 102 rejections where the alleged technical teaching can be found in the specification or the figures of Decker et al. The Examiner has referred to column 3, lines 41-45. However, this paragraph only states that a transformation between 3-dimensional color spaces is straightforward and unambiguous or unique within the color gamut of the printer and hence invertible. There is no hint of any gamut mapping.

The technical teaching disclosed in Decker et al. is merely related to a method of using transformations in three-dimensional subspaces as shown in FIG. 1 and explained in column 11, lines 2-49. Decker *et* al. do not contain any information about global gamut mapping. Instead, Decker et al. teach subsequent subspace transformations in order to construct a transformation for the entire four-dimensional space.

Clearly, Decker et al. do not show "by using <u>inverse gamut mapping</u>, transforming color values from the first image data set into color values of a device-independent color space and, by using <u>gamut mapping</u>, transforming these device-independent color values into the second image data set of an output device," as recited in claim 1 of the instant application. Chan does not make up for the deficiencies of Decker et al.

Claim 1 is, therefore, believed to be patentable over the art and since all of the dependent claims are ultimately dependent on claim 1, they are believed to be patentable as well.

Claim 11 has been added. Claim 11 is a more detailed version of claim 1 and is believed to be patentable for similar reasons to those discussed above.

In view of the foregoing, reconsideration and allowance of claims 1-7 and 11 are solicited.

In the event the Examiner should still find any of the claims to be unpatentable, counsel would appreciate a telephone call so that, if possible, patentable language can be worked out.

If an extension of time for this paper is required, petition for extension is herewith made. Please charge any fees which

might be due with respect to 37 CFR Sections 1.16 and 1.17 to

the Deposit Account of Lerner and Greenberg, P.A., No. 12-

1099.

Respectfully submitted,   **Yonghong Chen
                                           Reg. No. 56,150**

Yonghong Chen
For Applicants

YC

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Lerner and Greenberg, P.A.
Post Office Box 2480
Hollywood, FL 33022-2480
Tel: (954) 925-1100
Fax: (954) 925-1101